

**AFFIDAVIT AND APPLICATION  
SEARCH AND SEIZURE WARRANT**

JD-CR-61 Rev. 4-2002  
C.G.S. § 54-33a, 54-33c, 54-33i

**STATE OF CONNECTICUT  
SUPERIOR COURT**

www.jud.state.ct.us

Form JD-CR-52 must also be completed

Stamford PD  
JV-07-0026

PAGE 1 OF 6



**INSTRUCTIONS TO APPLICANT**

File the application for the warrant and all affidavits upon which the warrant is based with the clerk of the court for the geographical area within which any person who may be arrested in connection with or subsequent to the execution of the search warrant would be presented, together with the return of the warrant.

**INSTRUCTIONS TO G.A. CLERK**

Upon execution and return of the warrant, affidavits which are the subject of an order dispensing with the requirement of giving a copy to the owner, occupant or person within forty-eight hours shall remain in the custody of the clerk's office in a secure location apart from the remainder of the court file.

**TO: A Judge of the Superior Court or Judge Trial Referee:**

The undersigned, being duly sworn, complains on oath that the undersigned has probable cause to believe that certain property, to wit:

Heroin, cutting agents, glassine envelope, plastic baggies, strainers, scales, measuring devices, money and written records pertaining to the sales of narcotics, papers, photographs and keys showing occupancy, use and means of identification, telephone records, bank records and or safety deposit keys, weapons and handguns and electronic devices such as portable telephones and beepers used for communication of drug operations, computers used for record keeping practices of drug sales and cameras commonly used for the protection of drug trafficking operations and home made video tapes showing use and or sales of narcotics.

**COPY**

File to  
CV-07-0026

☒ is possessed, controlled, designed or intended for use of which is or has been or may be used as the means of committing the criminal offense of:  
21a-278(b) Possession of Narcotics With Intent To Sell  
21a-279a Possession of Narcotics

☐ was stolen or embezzled from:

☒ constitutes evidence of the following offense or that a particular person participated in the commission of the offense of:  
21a-278(b) Possession of Narcotics With Intent To Sell  
21a-279a Possession of Narcotics

☐ is in the possession, custody or control of a journalist or news organization, to wit:

☐ and such person or organization has committed or is committing the following offense which is related to such property:

☐ and such property constitutes contraband or an instrumentality of the criminal offense of:

And is within or upon a certain person, place, or thing, to wit:

PERSON

Angel PEREZ DOB 4-4-1968

PLACE OR THING

Residence at 259 Jackson Avenue located in Stratford Connecticut

And that the facts establishing the grounds for issuing a Search and Seizure Warrant are the following:

The undersigned, Task Force Agent William Jennings, being duly sworn does depose and state that he is a member of the Stratford Police Department and has been since 11/03/1987. This affiant is currently assigned to the United States Drug Enforcement Administration as a Task Force Agent and has been since April 2002. At all times mentioned herein he was acting as a member of said department and administration. The following facts and circumstances are stated from personal knowledge and observations as well as information received from other police officers and agents acting in their official capacity and from official police reports and statements.

The undersigned being duly sworn, Drug Enforcement Administration Special Agent Ryan Mensing depose and state that he is a member of said administration and has been since August 2003. The following facts and circumstances are stated from personal knowledge and observations as well as information received from other police officers and agents acting in their official capacity and from official police reports and statements.

On August 1, 2007, approximately 1:00 PM, an undercover officer, hereafter referred to as the UC, placed a consensual recorded telephone call to Angel PEREZ, A.K.A. "LEFTY", and arranged to meet with him in a pre-arranged location in Bridgeport, Connecticut. Angel PEREZ, date of birth April 4, 1968, has been positively identified by affiants and the UC. PEREZ' residence has been positively identified as 259 Jackson Avenue in Stratford, Connecticut.

Upon meeting, the UC told PEREZ how much heroin the UC wanted. The UC stated to PEREZ that he did not have the money with him and that he would have to get it. PEREZ then stated to the UC that he was going to get his friend's car and then go get the Heroin. PEREZ then left the UC and returned to his vehicle.

At approximately 5:36 PM, PEREZ contacted The UC and advised him to meet at a pre-arranged location

At approximately 5:50 PM, PEREZ arrived at the pre-arranged location. PEREZ was operating a tan Cadillac. PEREZ then exited the vehicle and met with the UC and handed the UC a white colored napkin which contained an amount of suspected heroin. The UC then gave PEREZ the agreed amount of U.S. currency.

Affiant field tested the product which resulted in a positive reaction for heroin. PEREZ and the UC then exited the meet location. The UC returned to his vehicle and left the area followed by Surveillance. Surveillance units followed PEREZ directly back to his home at 259 Jackson Avenue in Stratford, Connecticut where he entered same.

Wherefore the undersigned requests that a warrant may issue commanding a proper officer to search said person or to enter into or upon said place or thing, search the same, and take into custody all such property.

CITY/TOWN	DATE	SIGNATURE AND TITLE OF AFFIANT
Bridgeport	8-28-07	<i>[Signature]</i>
Bridgeport	8-28-07	<i>[Signature]</i>
JURAT	Subscribed and sworn to before me on: 8/28/07	<i>[Signature]</i>

(See PAGE 3 below for continuing Affidavit; Signatures of Affiant(s); and Jurat)

And that the facts establishing the grounds for issuing a Search and Seizure Warrant are the following:

On August 20, 2007, the same UC arranged to meet Angel PEREZ at a pre-arranged location in Connecticut to arrange for the purchase of heroin. The UC was outfitted with a kel recorder. The UC was given a pre-recorded amount of U.S. currency.

On 8-20-2007 at approximately 1:08 PM PEREZ arrived at the pre-arranged location. PEREZ met with the UC. At approximately 2:13 PM, PEREZ called the UC and told the UC to go directly to another pre-arranged location in Connecticut. PEREZ claimed that he was meeting the source in the area and that he would bring the heroin to the UC after meeting with his supplier.

At approximately 4:00 PM the UC and surveillance units arrived at the pre-arranged location. PEREZ was observed arriving to the location in a Honda. The UC immediately met with PEREZ. PEREZ then sold an amount of suspected heroin to the UC for an agreed amount of U.S. currency. Affiant field tested the product which resulted in a positive reaction for heroin.

At approximately 4:03 PM surveillance units followed PEREZ directly back to his home at 259 Jackson Avenue in Stratford, Connecticut where he entered same.

Wherefore the affiant's believe, based on their training and experience and upon the facts and circumstances stated within this affidavit, that they have established probable cause to believe that Angel PEREZ' person, the interior of 259 Jackson Avenue in Stratford, Connecticut, the surrounding curtilage and basement area under the control of Angel PEREZ, does contain contraband and request a search and seizure warrant be issued for the places as listed for and the items to be searched for on the face of this warrant.

Wherefore the undersigned requests that a warrant may issue commanding a proper officer to search said person or to enter into or upon said place or thing, search the same, and take into custody all such property.

CITY/TOWN		DATE	SIGNATURE AND TITLE OF AFFIANT
Bridgeport		8-27-07	JLA
Bridgeport		8-28-07	SIA [Signature]
JURAT	Subscribed and sworn to before me on:	DATE 8/28/07	Det B. [Signature]

(See PAGE 3 below for continuing Affidavit; Signatures of Affiant(s); and Jurat)

POLICE DEPARTMENT Stratford PD	CASE NO CV-07-0026	AFFIANT Detective William Jennings	AFFIANT S/A Ryan Mensing
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**AFFIDAVIT REQUESTING DISPENSATION  
WITH REQUIREMENT OF DELIVERY  
pursuant to § 54-33c, Connecticut General Statutes**

TO: A Judge of the Superior Court or a Judge Trial Referee

For the reasons set forth below, the undersigned, being duly sworn, requests that the judge / judge trial referee dispense with the requirement of C.G.S. § 54-33c that a copy of the application for the warrant and a copy of any affidavit(s) in support of the warrant be given to the owner, occupant or person named therein with forty-eight hours of the search.

- ☐ The personal safety of a confidential informant would be jeopardized by the giving of a copy of the affidavits at such time;
- ☒ The search is part of a continuing investigation which would be adversely affected by the giving of a copy of the affidavits at such time;
- ☐ The giving of such affidavits at such time would require disclosure of information or material prohibited from being disclosed by chapter 959a of the general statutes;

and the specific details with regard to such reasons are as follows:

would jeopardize existing confidential sources of information and an ongoing investigation into associates of the person named in this search warrant

The undersigned further requests that this affidavit also be included in such nondelivery.

STATE OF CONNECTICUT

CITY/TOWN	DATE	SIGNATURE AND TITLE OF AFFIANT
Bridgeport	8-28-07	Detective William Jennings
Bridgeport	8-28-07	S/a Ryan Mensing

			INVENTORY CONTROL NO.
JUDICIAL DISTRICT OF Fairfield	G. A. 2	AT (Address of Court) 172 Golden Hill Street	
DOCKET NO. CR-		UNIFORM ARREST NO.	POLICE CASE NO. CV-07-0026
		COMPANION CASE NO.	

Then and there by virtue of and pursuant to the authority of the foregoing warrant, I searched the person, place or thing named therein, to wit:

PERSON

Angel PEREZ DOB 4-4-1968

PLACE or THING

Residence at 259 Jackson Avenue located in Stratford Connecticut

and found thereon or therein, seized, and now hold in custody, the following property:

Total Cash Seized: \_\_\_\_\_, consisting of

and I gave a copy of such warrant to \_\_\_\_\_, the owner or occupant of  
the dwelling, structure, motor vehicle or place designated therein, or to \_\_\_\_\_  
the person named therein, on (Date); \_\_\_\_\_

DATE OF THIS RETURN	SIGNED (Officer's signature and department) Detective William Jennings Stratford PD
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POLICE DEPARTMENT	CASE NO	AFFIANT	AFFIANT
Stratford PD	CV-07-0026	Detective William Jennings	S/A Ryan Mensing

The foregoing Affidavit and Application for Search and Seizure Warrant having been presented to and been considered by the undersigned, a Judge of the Superior Court or a Judge Trial Referee, and the foregoing Affidavit having been subscribed and sworn to by the affiant(s) before me at the time it was presented, the undersigned (a) is satisfied therefrom that grounds exist for said application, and (b) finds that said affidavit established grounds and probable cause for the undersigned to issue this Search and Seizure Warrant, such probable cause being the following: From said affidavit, the undersigned finds that there is probable cause for the undersigned to believe that the property described in the foregoing affidavit and application is within or upon the person, if any, named or described in the foregoing affidavit and application, or the place or thing, if any, described in the foregoing affidavit and application, under the conditions and circumstances set forth in the foregoing affidavit and application, and that, therefore, a Search and Seizure Warrant should issue for said property.

NOW THEREFORE, by Authority of the State of Connecticut, I hereby command any Police Officer of a regularly organized police department, any State Police Officer, or any conservation officer, special conservation officer or patrol officer acting pursuant to C.G.S. § 26-6 to whom these presents shall come within ten days after the date of this warrant to

☒ enter into or upon and search the place or thing described in the foregoing affidavit and application, to wit:

Residence at 259 Jackson Avenue located in Stratford Connecticut described as a single family residence color white with a garage attached under the front of the home. The numerals 259 are clearly posted on the residences mailbox.

☒ search the person described in the foregoing affidavit and application, to wit:

Angel PEREZ DOB 4-4-1968

for the property described in the foregoing affidavit and application, to wit:

Heroin, cutting agents, glassine envelope, plastic baggies, strainers, scales, measuring devices, money and written records pertaining to the sales of narcotics, papers, photographs and keys showing occupancy, use and means of identification, telephone records, bank records and or safety deposit keys, weapons and handguns and electronic devices such as portable telephones and beepers used for communication of drug operations, computers used for record keeping practices of drug sales and cameras commonly used for the protection of drug trafficking operations and home made video tapes showing use and or sales of narcotics.

☐ submit the property described in the foregoing affidavit and application to laboratory analysis and examination, to wit:

and upon finding said property to seize the same, take and keep it in your custody until the further order of the court, and with reasonable promptness make due return of this warrant accompanied by a written inventory of all property seized.

☐ The foregoing requests that the judge or judge trial referee dispense with the requirement of C.G.S. § 54-33c that a copy of the warrant application and affidavit(s) in support of the warrant be given to the owner, occupant or person named therein and that the affidavit in support of such request also be included in such nondelivery is hereby:

NOT TO EXCEED 2 WEEKS BEYOND DATE WARRANT IS EXECUTED

☒ GRANTED for a period of

10 days

This order, or any extension thereof, dispensing with said requirement shall not limit disclosure of such application and affidavits to the attorney for a person arrested in connection with or subsequent to the execution of the search warrant unless, upon motion of the prosecuting authority within two weeks of such arraignment the court finds that the state's interest in continuing nondisclosure substantially outweighs the defendant's right to disclosure.

☐ DENIED

(NOTE: AFFIANT'S OATH MUST BE TAKEN PRIOR TO JUDGE / JUDGE TRIAL REFEREE SIGNING BELOW)

Signed at	Bridgeport, Connecticut, on:	DATE	8/28/07	AT (Time)	2:25	<input type="checkbox"/> a.m. <input checked="" type="checkbox"/> p.m.
SIGNED (Judge / Judge Trial Referee)		PRINT NAME OF JUDICIAL OFFICIAL				
[Signature]		[Signature]				